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11 **UNITED STATES BANKRUPTCY COURT**

12 **DISTRICT OF NEVADA**

13 In re

14 CASH CLOUD, INC.,
15 dba COIN CLOUD,

16 Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**DECLARATION OF TANNER JAMES
IN SUPPORT OF JOINT MOTION TO
APPROVE SETTLEMENT
AGREEMENT WITH COLE KEPRO
INTERNATIONAL, LLC PURSUANT
TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 9019**

Hearing Date: November 30, 2023

Hearing Time: 10:30 a.m.

FOX ROTHSCHILD LLP
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I, Tanner James, declare as follows:

1. I am a Vice President of Province, LLC, financial advisor to Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”).

2. Except as otherwise indicated herein, this Declaration is based upon my personal knowledge. I am over the age of 18 and am mentally competent. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

3. I make this Declaration in support of the *Joint Motion to Approve Settlement Agreement With Cole Kepro International, LLC Pursuant to Federal Rule of Bankruptcy Procedure 9019* [ECF No. 1375] (the “Motion”).¹

4. I reviewed the financial documents provided by Cole Kepro, under a non-disclosure agreement, and determined that it did not have the assets to satisfy its obligations and low cash on hand.

5. The Debtor assessed Cole Kepro’s claims against the Debtor to determine what would be the likelihood of it collecting the full amount it was seeking to determine a settlement amount that both parties would agree on.

6. The Debtor assessed the claims it had against Cole Kepro and determined that because of Cole Kepro’s financial condition, pursuing litigation to receive a judgment would not bear a net positive since there was a high probability that the Debtor would not be able to collect on its judgment.

7. At Province, LLC, we started a marketing effort to sale Debtor’s claims against Cole Kepro but quickly ended it when we saw no interest.

I declare, under penalty of perjury of the laws of the United States of America, that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed this 20th day of October 2023 in Las Vegas, Nevada.

/s/Tanner James

Tanner James

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.